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14	Group Unlimited, Inc		
15	UNITED STATES DISTRICT COURT		
16			
17	DISTRICT (JF NEVADA	
18	RICHARD GIBSON, and HERIBERTO VALIENTE,	Case No. 2:23-cv-00140-MMD-DJA	
19	Plaintiffs,	STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR	
20	V.	DEFENDANT THE RAINMAKER GROUP UNLIMITED, INC. TO	
21	MGM RESORTS INTERNATIONAL,	RESPOND TO THE COMPLAINT	
22	CENDYN GROUP, LLC, THE RAINMAKER GROUP UNLIMITED, INC., CAESARS	(FIRST REQUEST)	
23	ENTERTAINMENT INC., TREASURE ISLAND, LLC, WYNN RESORTS	,	
24	HOLDINGS, LLC,		
25	Defendant.		
26	IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Richard Gibson and		
27	Heriberto Valiente ("Plaintiffs") and Defendant The Rainmaker Group Unlimited, Inc.		

("Defendant"), by and through their respective counsel and pending the Court's approval, that Defendant shall have an additional nineteen days to answer or otherwise respond to the Complaint [ECF No. 1]. Defendant's original response deadline is March 8, 2023. With an additional nineteen days, Defendant's deadline to respond to the Complaint is extended to March 27, 2023, and will align with the parties' stipulated deadline to respond to the Complaint for the remaining defendants in the case. In the event that Defendant moves to dismiss the Complaint, the parties shall meet and confer and thereafter submit to the Court a mutually agreeable schedule for further briefing on any such motion.

Good cause exists for the extension set forth herein. Defense counsel were only recently retained in this matter and require additional time to determine how best to address Plaintiffs' Complaint. This is the first extension requested for Defendant to respond to the Complaint and is not made for the purpose of delay.

Dated: March 8 2023.

Nicholas J. Santoro (NV Bar No. 14514)

/s/ Nicholas J. Santoro

HOLLEY DRIGGS

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12		Attorneys for Plaintiffs Richard Gibson and Heriberto Valiente
13		
14		
15		IT IS SQ ORDERED:
16		
17		DANIEL J. ALBREGTS
18		UNITED STATES MAGISTRATE JUDGE
19		DATED: March 9, 2023
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